

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA, <i>ex rel.</i> Patrick Girard	:	
	:	Civil Action No.: 4:17-cv-00147
Plaintiff,	:	
v.	:	Judge Amos L. Mazzant, III
LOCKHEED MARTIN CORPORATION,	:	
Defendant.	:	
	:	
	:	

NOTICE OF DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1)(A), Relator Patrick Girard (“Relator”) hereby provides notice of the voluntary dismissal with prejudice of his claim brought under 31 U.S.C. § 3730(h). As additional background, Relator states as follows:

1. Relator and the United States previously filed a Joint Stipulation of Dismissal addressing all claims brought on behalf of the United States pursuant to 31 U.S.C. § 3730(b)(1).
See Dkt. #74.

2. In his Third Amended Complaint, Relator also asserts a personal claim for retaliation under 31 U.S.C. § 3730(h). *See* Dkt. #57, ¶ 72. This Notice of Dismissal provides for the voluntary dismissal with prejudice of Relator’s personal retaliation claim.

3. Dismissal of the action pursuant to Fed. R. Civ. P. 41(a)(1)(A) is appropriate because Defendant Lockheed Martin has not served an answer or motion for summary judgment in this action. Together, the Joint Stipulation of Dismissal and this Notice of Dismissal address the terms of dismissal of all claims brought in this action.

4. As requested in the Joint Stipulation of Dismissal, Relator and the United States ask that the Court retain jurisdiction to the extent necessary to enforce the Settlement Agreement and to address any disputes regarding Relator's claim for a statutory share of the *qui tam* settlement pursuant to 31 U.S.C. § 3730(d). *See* Dkt #74, ¶ 6.

Respectfully submitted,

Sam Boyd

Samuel L. Boyd
Catherine C. Jobe
BOYD & ASSOCIATES, PC
6440 North Central Expressway, Suite 600
Dallas, TX 75206-4101
Tel (214) 696-2300
sboyd@boydfirm.com
cjobe@boydfirm.com

Jeffrey R. Bragalone
BRAGALONE OLEJKO SAAD PC
2200 Ross Avenue
Suite 4600W
Dallas, TX 75201
Tel: (214) 785-6670
jbragalone@bosfirm.com

Roger D. Sanders
LAW OFFICES OF ROGER SANDERS
111 South Travis
Sherman, Texas 75090
Telephone: (903) 892-9133
rsanders@somlaw.net

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, a true and correct copy of the foregoing document was filed electronically with the court and has been sent to counsel of record via the court's electronic filing system.

Sam Boyd

Samuel L. Boyd